

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

RICHARD MEYER,

Plaintiff,

v.

MARK WAID,

Defendant.

§  
§  
§  
§  
§  
§  
§  
§  
§

CASE NO. 1:18-CV-00800-LY

**UNOPPOSED AND JOINT MOTION TO EXTEND TIME TO RESPOND TO  
DEFENDANT'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION  
AND TO FILE REPLY**

Plaintiff Richard Meyer and Defendant Mark Waid file this Unopposed and Joint Motion to Extend Time to Respond to Defendant's Motion to Dismiss for Lack of Personal Jurisdiction and to File Reply (the "Motion").

1. Defendant Mark Waid filed his Motion on November 2, 2018 (Dkt. 10).
2. Plaintiff Richard Meyer filed an unopposed motion for leave to conduct jurisdictional discovery on November 28, 2018 (Dkt. 16), and the Court granted the motion on November 29, 2018 (Dkt. 17). The Court, *inter alia*, allowed certain jurisdictional discovery, and ordered that Plaintiff's response to the Motion be due March 29, 2019 (Dkt. 17).
3. The parties have engaged in discovery on the jurisdictional issues. However, Defendant's counsel has a trial set in Travis County District Court starting the week of April 8, 2019 and will be preparing for trial the week before. Currently, with the Plaintiff's response deadline of March 29<sup>th</sup>, Defendant's reply would be due April 8, 2019, which will be during Defendant's trial and trial preparations.

4. The parties have agreed that Plaintiff's response to the Motion will be due on or before April 12, 2019, and Defendant's reply will be due on or before April 22, 2019.

### **CERTIFICATE OF CONFERENCE**

Undersigned counsel for Plaintiff and Defendant have conferred and they agree to the relief requested herein.

### **PRAYER**

The parties request that the Court grant their request that Plaintiff file his response to the Motion on or before April 12, 2019, and Defendant file his reply on or before April 22, 2019.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendant request that the Court sign the attached order granting the extension requested herein.

Dated: March 20, 2019

Respectfully submitted,

REEVES & BRIGHTWELL LLP

/s/ Ryan Pierce

Beverly Reeves  
State Bar No. 16716500  
breeves@reevesbrightwell.com  
Ryan Pierce  
State Bar No. 24035413  
rpierce@reevesbrightwell.com  
221 W. 6<sup>th</sup> Street, Suite 1000  
Austin, TX 78701-3410  
512.334.4500  
512.334.4492 (Facsimile)

Mark S. Zaid, Esq.  
D.C. Bar #440532 (admitted *Pro Hac Vice*)  
Mark@MarkZaid.com  
Mark S. Zaid, P.C.  
1250 Connecticut Ave., N.W., Suite 700  
Washington, D.C. 20036  
(202) 454-2809  
(202) 330-5610 fax

**ATTORNEYS FOR DEFENDANT**

FRITZ, BYRNE, HEAD & GILSTRAP, PLLC

/s/ Dale L. Roberts

Daniel H. Byrne  
State Bar No. 03565600  
dbyrne@fbhg.law  
Dale L. Roberts  
State Bar No. 24001123  
droberts@fbhg.law  
221 West Sixth Street, Suite 960  
Austin, TX 78701  
(512) 476-2020  
(512) 477-5267 (facsimile)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of March 2019, a true and correct copy of the foregoing document was sent via CM/ECF electronic filing to the following:

Daniel H. Byrne  
Dale L. Roberts  
Fritz, Byrne, Head & Gilstrap, PLLC  
221 W. 6th Street, Suite 960  
Austin, TX 78701  
dbyrne@fbhg.law  
droberts@fbhg.law

/s/ Ryan Pierce

Ryan Pierce